



**FULTON COUNTY, GEORGIA**  
**OFFICE OF THE COUNTY AUDITOR**  
**FULTON COUNTY BOARD OF HEALTH – WOMEN,  
INFANTS AND CHILDREN PROGRAM**  
**TITLE VI COMPLIANCE SITE REVIEW REPORT**

**September 18, 2018**

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## INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal Financial Assistance (FFA). Title VI compliance requirements apply to any county department, agency or sub-recipient that receives FFA.

The Office of the County Auditor conducted a site review of the Fulton County Board of Health – Women, Infants and Children (WIC) Program with Jennifer Culler, Senior Assistant County Attorney and Alice Flen, WIC Health Coordinator. The site review addressed the Title VI compliance requirements for the period of July 01, 2018 – June 30, 2019. The amount for the grant is \$2,568,537.000.

The following service locations were visited as part of the Title VI site review:

- Adamsville Reginal Health Center, 3700 Martin Luther King Jr. Dr., SW, Atlanta, GA 30331
- College Park Regional Health Center, 1920 John Wesley Avenue, College Park, GA 30337
- Neighborhood Union Health Center, 186 Sunset Ave., Atlanta, GA 30314
- North Fulton Service Center, 7741 Roswell Road, Sandy Springs, GA 30350
- North Fulton Regional Health Center, 3155 Royal Drive, Suite 125, Alpharetta, GA 30022
- Oak Hill Child, Adolescent and Family Center, 2805 Metropolitan Parkway, Atlanta, GA 30315

## BACKGROUND

The mission of WIC is to safeguard the health of low-income pregnant women, breastfeeding mothers, infants, and children up to age 5 who are nutritionally and medically at risk. WIC provides nutritious foods to supplement diets as well as information on healthy eating and referrals to health care.

## OBJECTIVES

The Office of the County Auditor has the responsibility of conducting Title VI Compliance Site Reviews of federal financial assisted recipients and sub-recipients to determine whether they are honoring their commitments, as represented by certification, to comply with the Title VI/Non-discrimination Civil Rights requirements.

The primary objective of the site review was to determine if the WIC Program has met its General Reporting and Program-Specific contractual requirements of the state, federal and county laws, policies, rules and regulations relating to Title VI. In addition, requirements and guidance measures of Limited English Proficiency (LEP) for program recipients, sub-recipients and contractors were discussed.

The secondary objective of the Title VI Compliance Site Review was to provide technical assistance in the form of training and to make recommendations regarding corrective actions as deemed necessary and appropriate.

## SCOPE

The scope of this Title VI Compliance Site Review of the WIC Program examined the following requirements according to the agreement with the State of Georgia and the Federal Administration of Public Health Services:

### (1) General Requirements

- a. Each application for federal assistance contains signed assurances or award contract agreement of compliance with Civil Rights regulations.
- b. A copy of the agency’s Title VI complaint procedures.
- c. A copy of the agency’s Title VI and LEP plan for providing access to Limited English populations.
- d. A posted copy of appropriate civil rights posters, pamphlets and notice to public information.
- e. Placement of “babel” notice in service locations and on service documents.  
(Notification of translation services provided at no additional cost to participants)

### (2) Program-Specific Requirements

- a. A description of how the agency monitors its sub-recipients for compliance with Title VI (if applicable).
- b. A copy of sub-recipients’ Annual Title VI Certifications and Assurances (if applicable).
- c. Ensure meaningful access to programs and activities by persons with limited English proficiency.
- d. Promote the full and fair participation of all affected populations of programs and activities through public outreach strategies.

## METHODOLOGY

An initial memorandum was sent to Dr. Toomey, Director of Public Health, providing notification of the site review. In addition, an email was sent to Ms. Jennifer Culler, providing the same notification information along with an electronic copy of the Title VI Compliance Site Review Tool used to conduct the monitoring. The tool provided a preview of compliance areas that would be assessed.

The review tool was utilized to assess the various areas of the Agency’s Title VI requirements as well as gather information relating to Title VI specialty areas (Public Participation/Outreach and Service Recipient Demographics (when applicable)).

In addition, the recipient’s Title VI Liaison was provided Title VI Basics and Compliance Training and law updates during the site review, along with the proper use of the County’s

language line service. This training assists with the efforts of understanding, obtaining and maintaining continuous non-discrimination compliance.

## **REQUIREMENTS, FINDINGS AND RECOMMENDATIONS**

### **Findings**

No findings of Title VI deficiencies.

## **CONCLUSION**

The Fulton County Board of Health – WIC Program demonstrated Title VI compliance as required. The recipient displayed proper Title VI signage in appropriate places thereby, providing Title VI awareness to clients and employees. Also, the program provided copies of the mandatory assurances/awarded contract agreement signed off by the County’s Public Health Director.

The WIC Program has adopted Fulton County’s Title VI complaint process and complies and abides by all federal and state laws prohibiting discrimination. The agency ensures LEP compliance through the use of translated posters, the clinic’s website, interpretation and translation vendor services, when needed, and bi-lingual staff at no additional cost to clients.

The division is compliant with Title VI Civil Rights policies, regulations, procedures and contract agreements. The compliance site review demonstrated that the WIC Program is thorough in complying with Title VI requirements of public health administered by the State of Georgia and the Federal Administration of Public Health Services.

The Office of the County Auditor has worked diligently to develop Title VI/Non-discrimination guidelines, policies, tools and training as well as provide technical assistance to Fulton County federal recipient programs and its sub-recipients. We will continue to ensure that each department and agency promotes and implements proper measures to meet and maintain compliance with Title VI requirements, policies and procedures.

Please provide a written response to this review within 10 business days if findings and/or concerns are listed in this report. You may email your written response to the County Manager, Dick Anderson, and Trina Alston, Title VI Coordinator, in the Office of the County Auditor. We would like to thank management and staff for their timely cooperation and assistance during this Title VI site review. The distribution of this report is reserved for the executive management of Fulton County and the Board of Commissioners.